

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-9108-RLM-11

**NOTICE OF FRANKGECKER LLP'S STATEMENT FOR SERVICES RENDERED
AND EXPENSES INCURRED FROM MAY 28, 2019 THROUGH JUNE 30, 2019**

PLEASE TAKE NOTICE that on July 18, 2019, FrankGecker LLP, as counsel to Fred C. Caruso, not individually, but as Future Claimants' Representative in this case, submitted its invoice for fees and expenses incurred between May 28, 2019 and June 30, 2019 (the "**Invoice**"), in accordance with the *Order Granting Debtor's Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Dkt. 187] (the "**Interim Compensation Order**").

PLEASE TAKE FURTHER NOTICE that the Invoice, attached hereto as Exhibit A, seeks compensation for \$43,287.50 in fees and \$235.10 in expenses.

PLEASE TAKE FURTHER NOTICE **that any objections to the Invoice must be filed and served upon the undersigned counsel by August 1, 2019 at 4:00 p.m. (prevailing Eastern Time) in accordance with the Interim Compensation Order.**

PLEASE TAKE FURTHER NOTICE that, if no objection is timely filed, the Debtor shall promptly pay 80% of the fees and 100% of the expenses identified in the Invoice, subject to final approval by the Court at a future hearing.

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

Dated: July 18, 2019

Respectfully submitted,

FRANKGECKER LLP

By: /s/ Micah R. Krohn

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*Counsel to Fred C. Caruso, not individually,
but as Future Claimants' Representative*

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2019 a copy of the foregoing *Notice of FrankGecker LLP's Statement for Services Rendered from May 28, 2019 through June 30, 2019* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on July 18, 2019, a copy of the foregoing *Notice of FrankGecker LLP's Statement for Services Rendered from May 28, 2019 through June 30, 2019* was served via electronic mail to the following:

United States Olympic Committee: Chris McCleary at chrismccleary@usoc.org
The Alexander, A Dolce Hotel and Wyndham Hotel Group LLC: Daniel M. Eliades at daniel.eliades@klgates.com and David S. Catuogno at david.catuogno@klgates.com

and by U.S. Mail to:

USA Gymnastics
130 E. Washington St., Ste. 700
Indianapolis, IN 46204

/s/ Micah R. Krohn